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*Attorneys for Higher Education Loan Authority  
of the State of Missouri*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CYNTHIA CHALAYE,

Plaintiff,

v.

TRANS UNION LLC; NATIONAL  
CONSUMER TELECOM & UTILITIES  
EXCHANGE, INC.; CLARITY SERVICES,  
INC. AND MISSOURI HIGHER EDUCATION  
LOAN AUTHORITY,

Defendants.

Case No. 2:25-cv-00319-GMN-EJY

**STIPULATION AND ORDER  
EXTENDING DEFENDANT HIGHER  
EDUCATION LOAN AUTHORITY OF  
THE STATE OF MISSOURI'S TIME  
TO FILE AN ANSWER OR  
OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

**(First Request)**

**STIPULATION**

Plaintiff Cynthia Chalaye ("Plaintiff") and Defendant Higher Education Loan Authority of the State of Missouri ("MOHELA"), by and through their respective undersigned counsel, hereby stipulate as follows:

1. On February 18, 2025, Plaintiff filed her complaint in this Court.
2. On February 20, 2025, MOHELA was served with the Complaint.
3. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), MOHELA must file its response to the Complaint on or before March 13, 2025.

4. MOHELA has requested, and Plaintiff has agreed to, an additional 21 days (up to and including April 3, 2025) for MOHELA to answer or otherwise plead in response to the

1 Complaint. Good cause exists for MOHELA's request to extend the current response deadline by  
 2 21 days, as Plaintiff and MOHELA are engaged in case-resolution negotiations, including factual  
 3 research into Plaintiff's allegations of the Complaint to aid informal resolution discussions.

4 5. Plaintiff does not oppose an extension of MOHELA's time to respond to the  
 5 Complaint so that the Parties can devote their time to resolving the matter. Pursuant to Local Rule  
 6 IA 6-1, MOHELA respectfully requests the Court for an extension of time to file its responsive  
 7 pleading for 21 days, up to and including April 3, 2025.

8 6. This stipulation is not for purposes of delay and is the first request of the parties to  
 9 extend this deadline.

10 DATED this 13<sup>th</sup> day of March, 2025.

DATED this 13<sup>th</sup> day of March, 2025.

11  
 12 /s/ Gerardo Avalos

13 George Haines, Esq.  
 14 Gerardo Avalos, Esq.  
 15 FREEDOM LAW FIRM  
 16 8985 South Eastern Avenue, Suite 100  
 17 Las Vegas, Nevada 89123

18 *Attorneys for Plaintiff*

12 /s/ Patrick J. Reilly

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18 *Attorneys for Higher Education Loan Authority  
 of the State of Missouri*

### 19 ORDER

20 Pursuant to the foregoing Stipulation, and with good cause appearing, IT IS HEREBY  
 21 ORDERED that MOHELA shall have up to and including April 3, 2025, to answer or otherwise  
 22 plead in response to the Complaint on file herein.

23 IT IS SO ORDERED.

24   
 25 UNITED STATES MAGISTRATE JUDGE

26 Dated: March 13, 2025